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Attorneys for Respondent Republic of Kazakhstan

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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ANATOLIE STATI, <i>et al.</i> ,	:	
	:	
Petitioners,	:	
	:	
v.	:	1:19-mc-00382 (PAE)
	:	
REPUBLIC OF KAZAKHSTAN,	:	ORAL ARGUMENT REQUESTED
	:	
Respondent.	:	
	:	
	:	
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**RESPONDENT REPUBLIC OF KAZAKHSTAN'S
NOTICE OF MOTION FOR PROTECTIVE ORDER**

PLEASE TAKE NOTICE that, upon the accompanying memorandum of law, the declaration of Matthew H. Kirtland, dated March 11, 2024, and the exhibits attached thereto, and upon all papers and proceedings previously had herein, Respondent Republic of Kazakhstan will move this Court, before the Honorable Paul A. Engelmayer at the Thurgood Marshall United States

Courthouse, 40 Foley Square, New York, NY 10007, on the date and time that the Court may set, for a protective order that (i) orders the Petitioners to serve the Republic with all subpoenas that they have issued to non-parties in this action; (ii) quashes all previously issued subpoenas not so served; and (iii) orders the Statists to comply with this service requirement as to any other subpoenas they issue in this action.

PLEASE TAKE FURTHER NOTICE that Petitioners' opposition papers must be served by March 25, 2024, and Respondent's reply papers must be served by April 15, 2024, pursuant to the Court's Order at ECF No. 24.

Respondent requests oral argument.

Dated: March 11, 2024

Respectfully submitted,

/s/ Matthew H. Kirtland

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